

1 Rafey Balabanian (SBN 315962)
2 rbalabanian@edelson.com
3 Todd Logan (SBN 305912)
tlogan@edelson.com
4 Yaman Salahi (SBN 288752)
ysalahi@edelson.com
5 EDELSON PC
150 California Street, 18th Floor
San Francisco, California 94111
Tel: 415.212.9300
6 Fax: 415.373.9435

Beatriz Mejia (SBN 190948)
mejiab@cooley.com
K.C. Jaski (SBN 334456)
kjaski@cooley.com
COOLEY LLP
3 Embarcadero Center, 20th Floor
San Francisco, CA 94111-4004
Tel: 415.693.2000
Fax: 415.693.2222

7 *Attorneys for Plaintiff and the Proposed Class*

Katelyn L. Kang (SBN 5745799)*
kkang@cooley.com
COOLEY LLP
55 Hudson Yards
New York, NY 10001-2157
Tel: 212.479.6000
9 Fax: 212.479.6275

10 Robby L.R. Saldaña (SBN 1034981)*
rsaldana@cooley.com
11 COOLEY LLP
12 1299 Pennsylvania Avenue, NW, Suite 700
Washington, D.C. 20004-2400
13 Tel: 202.842.7800
Fax: 202.842.7899

14 (*Admitted *Pro Hac Vice*)

15 *Attorneys for Defendant Two Jinn, Inc., (d/b/a*
16 *Aladdin Bail Bonds)*

17 **UNITED STATES DISTRICT COURT**
18 **NORTHERN DISTRICT OF CALIFORNIA**
19 **OAKLAND DIVISION**

20 SARA MEDINA, individually and on behalf of
all others similarly situated,

Case No. 4:22-cv-02540-JST

21 *Plaintiff,*

STIPULATION AND [PROPOSED]
ORDER RE: MOTION TO DISMISS
BRIEFING SCHEDULE

22 *v.*

23 TWO JINN, INC., a California corporation,
d/b/a ALADDIN BAIL BONDS

24 *Defendant.*

25
26
27
28

1 Pursuant to Civil Local Rule 6-2, Plaintiff Sara Medina (“Plaintiff”), together with
 2 Defendant Two Jinn, Inc. (“Defendant”), by and through their undersigned counsel, stipulate as
 3 follows:

4 WHEREAS, Defendant Two Jinn, Inc. filed a motion to dismiss on June 2, 2022
 5 (Dkt. 18);

6 WHEREAS, pursuant to Local Rule 7-3, Plaintiff Sara Medina must file her response to
 7 Defendant’s motion by June 16, 2022 (N.D. Cal. Civil L.R. 7-3), Defendant’s reply in support
 8 of its motion is due on June 23, 2022, and the hearing on said motion was originally set for
 9 August 18, 2022 at 2:00pm (Dkt. 18) but subsequently re-set for August 25, 2022 at 2:00pm
 10 (Dkt. 24);

11 WHEREAS, the parties have conferred and agree that, to ensure sufficient time to brief
 12 the issues for the Court in light of pre-existing obligations in other matters, and, subject to the
 13 approval of the Court, Plaintiff shall have until June 30, 2022, to respond to Defendant’s
 14 motion to dismiss, and that Defendant’s reply in support of the motion to dismiss will be due
 15 on July 14, 2022;

16 **NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED** that, subject
 17 to the Court’s approval, Defendant’s pending motion to dismiss will be briefed on the
 18 following schedule:

Event	Deadline
Plaintiff’s response to the motion to dismiss	June 30, 2022
Defendant’s reply in support of the motion to dismiss	July 14, 2022

1 Dated: June 6, 2022

Respectfully submitted,

2 By: /s/ Yaman Salahi

3 Rafey Balabanian (SBN 315962)
4 rbalabanian@edelson.com
5 Todd Logan (SBN 305912)
tlogan@edelson.com
6 Yaman Salahi (SBN 288752)
ysalahi@edelson.com
EDELSON PC
7 150 California Street, 18th Floor
San Francisco, California 94111
Tel: 415.212.9300
8 Fax: 415.373.9435

9 *Attorneys for Plaintiff Sara Medina and the*
10 *Proposed Class*

11 By: /s/ Robby L.R. Saldaña

12 Beatriz Mejia (SBN 190948)
mejiab@cooley.com
13 K.C. Jaski (SBN 334456)
kjaski@cooley.com
14 COOLEY LLP
15 3 Embarcadero Center, 20th Floor
San Francisco, CA 94111-4004
16 Tel: 415.693.2000
Fax: 415.693.2222

17 Katelyn L. Kang (SBN 5745799)*
kkang@cooley.com
18 COOLEY LLP
55 Hudson Yards
19 New York, NY 10001-2157
Tel: 212.479.6000
20 Fax: 212.479.6275

21 Robby L.R. Saldaña (SBN 1034981)*
rsaldana@cooley.com
COOLEY LLP
22 1299 Pennsylvania Avenue, NW, Suite 700
Washington, D.C. 20004-2400
23 Tel: 202.842.7800
Fax: 202.842.7899

24 (*Admitted *Pro Hac Vice*)

25 *Attorneys for Defendant Two Jinn, Inc., (d/b/a*
Aladdin Bail Bonds)

1 **ATTESTATION OF ELECTRONIC SIGNATURE**

2 I hereby attest that pursuant to N.D. Cal. Civil L.R. 5-1(h)(3), I have obtained the
3 authorization from the above signatories representing Defendant to file the above-referenced
4 document, and that the above signatories concur in the filing's content.

5 */s/ Yaman Salahi*

6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

1 **[PROPOSED] ORDER**

2 **PURSUANT TO STIPULATION, IT IS HEREBY ORDERED:**

3 Plaintiff's deadline to file a response to Defendant's pending motion to dismiss is now
4 June 30, 2022, and the Defendant's deadline to reply in support of the motion to dismiss is now
5 July 14, 2022.

6 ENTERED: June 15, 2022


Honorable Jon S. Tigar
United States District Court Judge

9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28